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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

16 ROHINI KUMAR, an individual, on behalf
17 of herself, the general public and those
similarly situated,

CASE NO. 4:14-cv-02411-YGR

18 || Plaintiff

**ADMINISTRATIVE MOTION TO SEAL
PORTIONS OF PLAINTIFF'S MOTION FOR
CLASS CERTIFICATION AND
SUPPORTING DECLARATIONS**

20 SALON NORTH AMERICA COBB

Date: April 12, 2016
Time: 2:00 p.m.
Courtroom 1

Defendant.

Hon. Judge Yvonne Gonzalez Rogers

1 Pursuant to Local Rule 79-5(d), Plaintiff Rohini Kumar respectfully files this
2 administrative motion to seal certain portions of the following documents:

3 Plaintiff's Motion for Class Certification

4 Declaration of Kristen G. Simplicio, including supporting exhibits

5 Declaration of Colin Weir, including supporting exhibits.

6 These documents contain information designated as confidential or highly confidential by
7 Defendant or third party Information Resources, Inc. ("IRI") pursuant to the protective order
8 entered in this case. Specifically, information derived from material designated highly
9 confidential by IRI appears at: (1) Page 7, line 20 of Plaintiff's Motion for Class Certification;
10 and (2) Paragraphs 49, 57, 59-63, and 74, and Tables 1-3 of the Declaration of Colin Weir. This
11 information is highlighted for this Court in blue. All other material that Plaintiff seeks to seal has
12 been designated confidential or highly confidential by Defendant and is highlighted in yellow.

13 Plaintiffs make this motion at the request of Defendant and IRI pursuant to Civil Local
14 Rules 7-11 and 79-5. In accordance with the local rules, Defendant and IRI will identify the
15 specific portions of the Motion Papers that they seek to seal and which remaining portions can be
16 filed in a redacted public version. Defendant and IRI will also provide in a separate filing, as
17 provided by the local rules, the evidentiary basis for its request to seal and a proposed order.
18 Plaintiffs reserve the right to oppose portions of their requests that exceed the scope of the
19 protective order and applicable law.

20 Dated: January 19, 2016

GUTRIDE SAFIER LLP

21 By: /s/ Kristen Simplicio

22 Adam J. Gutride

23 Seth A. Safier

24 Kristen G. Simplicio

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7
8 [] BY E-MAIL. I caused said documents to be transmitted to the email address
9 indicated.
10

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct and that this document was executed on January 19, 2016, at
13 Berkeley, California.



14 Kristen G. Simplicio, Esq.
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